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28 *Industrial Co., Ltd.) and Panasonic Corporation of North America*

**IN THE UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

20 In re: CATHODE RAY TUBE (CRT)  
21 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

22 This Document Relates to:

23 ALL INDIRECT-PURCHASER ACTIONS

24 *Sharp Electronics Corp., et. al. v. Hitachi Ltd.,*  
25 *et al.*, No. 13-cv-01173

26 *Electrograph Sys., Inc., et al. v. Hitachi, Ltd., et*  
27 *al.*, No. 11-cv-01656;

**DECLARATION OF SOFIA  
ARGUELLO IN SUPPORT OF  
DEFENDANTS PANASONIC  
CORPORATION OF NORTH  
AMERICA'S AND PANASONIC  
CORPORATION'S (F/K/A  
MATSUSHITA ELECTRIC  
INDUSTRIAL CO., LTD.)  
ADMINISTRATIVE MOTION TO  
SEAL DOCUMENTS PURSUANT TO  
CIVIL LOCAL RULES 7-11 AND 79-  
5(d)**

1 *Electrograph Sys., Inc., et al. v. Technicolor SA,*  
2 *et al.*, No. 13-cv-05724;

3 *Siegel v. Hitachi, Ltd., et al.*, No. 11-cv-05502;

4 *Siegel v. Technicolor SA, et al.*, No. 13-cv-  
05261;

5 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.*,  
6 No. 11-cv-05513;

7 *Best Buy Co., Inc., et al. v. Technicolor SA, et*  
8 *al.*, No. 13-cv-05264;

9 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*  
10 *et al.*, No. 11-cv-05514;

11 *Target Corp. v. Technicolor SA, et al.*, No. 13-  
12 cv-05686;

13 *Sears, Roebuck & Co., et al. v. Chunghwa*  
14 *Picture Tubes, Ltd., et al.*, No. 11-cv-05514;

15 *Sears, Roebuck & Co., et al. v. Technicolor SA,*  
16 *et al.*, No. 13-cv-05262;

17 *Interbond Corp. of Am. v. Hitachi, Ltd., et al.*,  
18 No. 11-cv-06275;

19 *Interbond Corp. of Am. v. Technicolor SA, et*  
20 *al.*, No. 13-cv-05727;

21 *Office Depot, Inc. v. Hitachi, Ltd., et al.*, No.  
22 11-cv-06276;

23 *Office Depot, Inc. v. Technicolor SA, et al.*, No.  
24 13-cv-05726;

25 *CompuCom Systems, Inc. v. Hitachi, Ltd., et al.*,  
26 No. 11-cv-06396;

27 *P.C. Richard & Son Long Island Corp., et al. v.*  
28 *Hitachi, Ltd., et al.*, No. 12-cv-02648;

*P.C. Richard & Son Long Island Corp., et al. v.*  
*Technicolor SA, et al.*, No. 13-cv-05725;

*Schultze Agency Servs., LLC v. Hitachi, Ltd., et*  
*al.*, No. 12-cv-02649;

*Schultze Agency Servs., LLC v. Technicolor SA,*  
*et al.*, No. 13-cv-05668;

*Tech Data Corp., et al. v. Hitachi, Ltd., et al.*,

1 No. 13-cv-00157

2 *Viewsonic Corp. v. Chunghwa Picture Tubes,*  
3 *Ltd., et al.*, No. 14-cv-02510.

1 I, Sofia Arguello, declare as follows:

2 1. I am an attorney with Winston & Strawn LLP, attorneys for Defendants  
3 Panasonic Corporation of North America (“PNA”), MT Picture Display Co., Ltd., and Panasonic  
4 Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) (“Panasonic Corp.”) (collectively, the  
5 “Panasonic Defendants”) in these actions. I am a member of the bar of the State of New York and I  
6 am admitted to practice before this Court *pro hac vice*.

7 2. I submit this declaration pursuant to Civil Local Rule 79-5(d) in Support of  
8 the PNA’s and Panasonic Corp.’s Administrative Motion to File Under Seal PNA’s and Panasonic  
9 Corp.’s Notice of Motion and Motion for Summary Judgment (the “Motion”). Except for those  
10 matters stated on information and belief, about which I am informed and which I believe to be true, I  
11 have personal knowledge of the facts stated herein and, if called as a witness, I could and would  
12 competently testify thereto.

13 3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this  
14 matter (No. 07-cv-05944, Dkt. No. 306, amended at Dkt. No. 1142) (the “Protective Order”).

15 4. On November 7, 2014, Defendants PNA and Panasonic Corporation filed an  
16 Administrative Motion to Seal, and lodged conditionally under seal, the following documents, or  
17 portions thereof, pursuant to Civil Local Rules 7-11 and 79-5(d):

18 (a) Portions of the Motion that contain quotations or information from documents  
19 and/or deposition testimony designated “Confidential” or “Highly Confidential;” and

20 (b) Exhibits 1 through 21 to the Declaration of Eva W. Cole in Support of the Motion  
21 (“Cole Declaration”).

22 5. Pursuant to Civil Local Rule 79-5(d), I make this declaration on behalf of the  
23 Panasonic Defendants to provide the basis for the Court to maintain under seal certain documents  
24 and information designated by the Panasonic Defendants as “Confidential” or “Highly Confidential”  
25 pursuant to the Stipulated Protective Order, and all references to those documents and information in  
26 the Motion.

27 6. Specifically, the Panasonic Defendants request that the following documents  
28 and excerpts of documents be maintained under seal: (i) Exhibit 1 to the Cole Declaration (excerpts

1 from the August 5, 2014 Expert Report of Dr. Darrell Williams (“Williams Report”)); (ii) Exhibit 2  
 2 to the Cole Declaration (excerpts from the deposition of Masashi Muramatsu, who was a percipient  
 3 witness for the Panasonic Defendants); (iii) Exhibit 3 to the Cole Declaration (excerpts from the  
 4 transcript of the deposition of Ayumu Kinoshita, who was a percipient witness for the Panasonic  
 5 Defendants); (iv) Exhibit 6 to the Cole Declaration (document bearing bates number PC-0020552  
 6 through PC-0020556); (v) Exhibit 7 to the Cole Declaration (document bearing bates number  
 7 MTPD-0176401); (vi) Exhibit 8 to the Cole Declaration (excerpts from the November 6, 2014 Sur-  
 8 Rebuttal Report of Dr. Darrell Williams (“Williams Rebuttal Report”)); (vii) Exhibit 16 to the Cole  
 9 Declaration (excerpts from the transcript of the deposition of Allen Chang, who was a percipient  
 10 witness for the Panasonic Defendants); (viii) Exhibit 17 to the Cole Declaration (excerpts from the  
 11 transcript of the deposition of Hirokazu Nishiyama, who was designated as a Fed. R. Civ. P. 30(b)(6)  
 12 witness for Panasonic Defendants); and (ix) all references to information designated “Confidential”  
 13 or “Highly Confidential” by the parties in the above captioned actions in the Motion.

14                 7. Attached as Exhibit 1 and 8 to the Cole Declaration are excerpts from the  
 15 Williams Report and the Williams Rebuttal Report, respectively.

16                 8. Upon information and belief, the Williams Report and Williams Rebuttal  
 17 Report contain, cite, identify and/or analyze confidential, nonpublic, proprietary and highly sensitive  
 18 information about the Panasonic Defendants’ sales processes, business practices, internal practices,  
 19 negotiating tactics, and competitive positions. The reports describe relationships with companies  
 20 that remain important to the Panasonic Defendants’ competitive position. I am informed and believe  
 21 that this is sensitive information and public disclosure of this information presents a risk of  
 22 undermining the Panasonic Defendants’ business relationships, would cause it harm with respect to  
 23 its competitors and customers, and would put the Panasonic Defendants at a competitive  
 24 disadvantage.

25                 9. Attached as Exhibit 2 to the Cole Declaration are excerpts from the transcript  
 26 of the deposition of Masashi Muramatsu, a percipient witness for the Panasonic Defendants.

27                 10. Upon information and belief, the transcript excerpts in Exhibit 2 to the Cole  
 28 Declaration consist of, cite to, and/or identify confidential, nonpublic, proprietary and highly

1 sensitive business information about the Panasonic Defendants' sales processes, business practices,  
2 internal practices, and competitive positions. I am informed and believe that this is sensitive  
3 information and public disclosure of this information presents a risk of undermining the Panasonic  
4 Defendants' business relationships, would cause it harm with respect to its competitors and  
5 customers, and would put the Panasonic Defendants at a competitive disadvantage.

6 11. Attached as Exhibit 3 to the Cole Declaration are excerpts from the transcript  
7 of the deposition of Ayumu Kinoshita, a percipient witness for the Panasonic Defendants.

8 12. Upon information and belief, the transcript excerpts in Exhibit 3 to the Cole  
9 Declaration consist of, cite to, and/or identify confidential, nonpublic, proprietary and highly  
10 sensitive business information about the Panasonic Defendants' sales processes, business practices,  
11 internal practices, and competitive positions. I am informed and believe that this is sensitive  
12 information and public disclosure of this information presents a risk of undermining the Panasonic  
13 Defendants' business relationships, would cause it harm with respect to its competitors and  
14 customers, and would put the Panasonic Defendants at a competitive disadvantage.

15 13. Attached as Exhibit 6 to the Cole Declaration is a true and correct copy of the  
16 document bearing bates number PC-0020552 through PC-0020556.

17 14. Upon information and belief, the document in Exhibit 6 to the Cole  
18 Declaration consists of, cites to, and/or identifies confidential, nonpublic, proprietary and highly  
19 sensitive business information about the Panasonic Defendants' sales processes and business  
20 practices. I am informed and believe that this is sensitive information and public disclosure of this  
21 information presents a risk of undermining the Panasonic Defendants' business relationships, would  
22 cause it harm with respect to its competitors and customers, and would put the Panasonic Defendants  
23 at a competitive disadvantage.

24 15. Attached as Exhibit 7 to the Cole Declaration is a true and correct copy of the  
25 document bearing bates number MTPD-0176401.

26 16. Upon information and belief, the document in Exhibit 7 to the Cole  
27 Declaration consists of, cites to, and/or identifies confidential, nonpublic, proprietary and highly  
28 sensitive business information about the Panasonic Defendants' sales processes, business practices

1 and internal practices. I am informed and believe that this is sensitive information and public  
2 disclosure of this information presents a risk of undermining the Panasonic Defendants' business  
3 relationships, would cause it harm with respect to its competitors and customers, and would put the  
4 Panasonic Defendants at a competitive disadvantage.

5 17. Attached as Exhibit 16 to the Cole Declaration are excerpts from the transcript  
6 of the deposition of Allen Chang, a percipient witness for the Panasonic Defendants.

7 18. Upon information and belief, the transcript excerpts in Exhibit 16 to the Cole  
8 Declaration consist of, cite to, and/or identify confidential, nonpublic, proprietary and highly  
9 sensitive business information about the Panasonic Defendants' sales processes, business practices,  
10 internal practices, and competitive positions. I am informed and believe that this is sensitive  
11 information and public disclosure of this information presents a risk of undermining the Panasonic  
12 Defendants' business relationships, would cause it harm with respect to its competitors and  
13 customers, and would put the Panasonic Defendants at a competitive disadvantage.

14 19. Attached as Exhibit 17 to the Cole Declaration are excerpts from the  
15 deposition transcript of Hirokazu Nishiyama, who was designated as a Fed. R. Civ. P. 30(b)(6)  
16 witness for the Panasonic Defendants.

17 20. Upon information and belief, the transcript excerpts appearing in Exhibit 17 to  
18 the Cole Declaration consist of, cite to, and/or identify confidential, nonpublic, proprietary and  
19 highly sensitive business information about the Panasonic Defendants' sales processes, negotiating  
20 tactics, business plans, and pricing practices. I am informed and believe that this is sensitive  
21 information and public disclosure of this information presents a risk of undermining the Panasonic  
22 Defendants' business relationships, would cause it harm with respect to its competitors and  
23 customers, and would put the Panasonic Defendants at a competitive disadvantage.

24 21. The highlighted portions of pages iv-v, 2-11, and 14-19 of the Motion quotes  
25 from or describes documents or information designated as "Confidential" or "Highly Confidential"  
26 by the Panasonic Defendants, including but not limited to Exhibits 1-3, 6-8, and 16-17. As with the  
27 exhibits themselves, I understand that the Panasonic Defendants consider any statements in the  
28 Motion purporting to summarize the exhibits or any other documents or information designated

“Confidential” or “Highly Confidential” by the Panasonic Defendants confidential and proprietary. I am informed and believe that the Panasonic Defendants have taken reasonable steps to preserve the confidentiality of information of the type contained, identified, or cited to in Exhibits 1-3, 6-8, and 16-17, and referenced in the Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: November 7, 2014

By: /s/ Sofia Arguello

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